

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MARKET AMERICA, INC.

Plaintiff,

v.

GOOGLE INC. and
LTECH CONSULTING, LLC,

Defendants.

Civil Action No.: 1:09-cv-00494-GMS

JURY TRIAL DEMANDED

**DEFENDANT LTECH CONSULTING, LLC'S MOTION TO DISMISS
PLAINTIFF MARKET AMERICA'S COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant
LTech Consulting, LLC moves to dismiss Plaintiff Market America's Complaint with prejudice
for the reasons set forth in the accompanying Opening Brief in Support of its Motion to Dismiss.

Respectfully Submitted,

By:



Michael F. Bonkowski (No. 2219)
COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.
500 Delaware Avenue, Suite 1410
Wilmington, DE 19801
(302) 651-2002 (Phone)
(302) 652-3117 (Fax)
mbonkowski@coleschotz.com

and

Peter J. Frazza (Admitted Pro Hac Vice)
Donald P. Jacobs (Admitted Pro Hac Vice)
BUDD LARNER, P.C.
150 John F. Kennedy Parkway
Short Hills, NJ 07078
(973)379-4800

Attorneys for Defendant,
LTech Consulting, LLC

Dated: August 31, 2009